



SIERRA
CLUB

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Redwood Chapter

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Clerk of the Board,
Air Resources Board
1001 I Street
Sacramento, California 95814

December 12, 2010

Re: Cap and Trade Program, Clearcuts

The Redwood Chapter of the Sierra Club, the nation's largest and oldest environmental organization, represents more than 9000 Club members in northwestern California.

On December 16, 2010, the Air Resources Board (ARB) is scheduled to consider adoption of the regulations for its Cap & Trade Program. One portion of the regulations would allow the largest emitters of greenhouse gases (GHGs) to offset some of their emissions (instead of reducing them) by buying credits for sequestration of extra carbon in California's forests in three ways: a) reforestation; b) preventing conversion of forest land to other uses (golf courses, development and shopping centers); and, c) "improved forest management practices." Unfortunately there is nothing explicit in the protocol that will prevent a clear cutter from using these subsidies to convert our naturally managed forest into clearcut "tree plantations".

To allow clearcutting in your program would call into question the credibility of the program. It would allow the facilities with greatest emissions (cement kilns, power plants and refineries) to avoid reductions by purchasing highly questionable clearcut offsets subsidizing the most aggressive and intrusive forest harvest techniques. California's working timberlands are important for the ecological services they provide. Our forests are the lungs of the earth, and control sedimentation and temperature of the waters we drink, and on which our salmon depend for reproduction. Evenaged, clearcut forests are less resilient, more prone to fire and disease, and provide less diversity of habitat for the species on which nature and Californians depend.

Not all offsets are created equal. This is a novel program and the accounting issues are complicated. We should adopt only programs that will most reliably assure actual sequestration and avoid those that ignore carbon impacts of entire components of the activity seeking to be called an "offset" such as clearcuts. We should particularly avoid subsidizing clearcuts because they are extremely difficult to assure additionality, and they also pose big environmental risks. Please protect the integrity of the climate program and resiliency of California's forests by eliminating from the offset program clearcutting of our forests as a way of sequestering carbon.

Sincerely,

Diane Beck, Conservation Chair
Redwood Chapter, Sierra Club